

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF OKLAHOMA

VANCE DOTSON

Plaintiff,

v.

AD ASTRA RECOVERY SERVICES,  
INC., and JEFFERSON CAPITAL  
SYSTEMS and KANSAS COUNSELORS,  
INC.,

Defendant.

) JURY TRIAL DEMANDED  
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) Case No. CIV-22-264-C  
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**FILED**

MAR 30 2022

CARMELITA REEDER SHINN, CLERK  
U.S. DIST. COURT WESTERN DIST. OKLA.  
BY KE DEPUTY

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COMPLAINT AND DEMAND FOR JURY TRIAL

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I. INTRODUCTION

1. This is a civil action for actual, statutory damages, and costs brought by Vance Dotson ("Plaintiff") an individual consumer, against Defendants, AD Astra Recovery Services, Inc., ("AD"), Jefferson Capital Systems, LLC ("JCS"), Kansas Counselors, Inc., ("KCI") for violations of the Fair Debt Collection Practices Act, 15 U.S.C § 1692 *et seq.* (hereinafter "FDCPA"), which prohibits debt collectors from engaging in abusive, deceptive, and unfair practices.

**2. II. JURISDICTION AND VENUE**

3. Jurisdiction of this court arises under 15 U.S.C § 1692k(d) 28 U.S.C 1331. Venue in this District is proper in that the Defendants transact business in Oklahoma City, Oklahoma County, Oklahoma, and the conduct complained of occurred in Oklahoma City, Oklahoma County, Oklahoma.

**III. PARTIES**

4. Plaintiff Vance Dotson (hereinafter "Mr. Dotson") is a natural person residing in Oklahoma City, Oklahoma County, Oklahoma. Mr. Dotson is a consumer as defined by the Fair Debt Collection Practices Act, 15 U.S.C. §1692a(3). Mr. Dotson has been assigned 100 percent of these claim(s) by Jordan Bundy.
5. Jordan Bundy is allegedly obligated to pay an obligation to pay money arising out of a transaction in which the money, property, insurance, or services which are the subject of the transaction are primarily for personal, family, or household purposes. Ms. Bundy is allegedly obligated to pay a "Debt" as defined by 15 usc§1692a(5).

6. Upon information and belief, Defendant AD Astra Recovery Services, Inc., is a Kansas corporation with its principal place of business located at 7330 W 33<sup>rd</sup> St, Wichita, Kansas 67205.
7. Upon information and belief, Defendant Jefferson Capital Systems LLC is a Minnesota corporation with its principal place of business located at 16 McLeland Rd, St Cloud, MN 56303.
8. Upon information and belief, Defendant Kansas Counselors Inc., is a Kansas corporation with its principal place of business located at 8725 Rosehill Rd Suite 415, Lenexa, KS 66215.
9. Defendants AD Astra Recovery Services, Inc., Jefferson Capital Systems LLC, Kansas Counselors Inc., is engaged in the collection of debt from consumers using the mail and telephone. Defendant regularly attempt to collect consumers' debts alleged to be due to another's.

#### **IV. FACTS OF THE COMPLAINT**

10. Defendants, AD Astra Recovery Services, Inc., Jefferson Capital Systems LLC, Kansas Counselors Inc., (hereinafter referred to as "Debt Collector") are a "debt collector" as defined by the FDCPA, 15 U.S.C § 1692a(6).

11. On or about May 17, 2021, Mr. Bundy reviewed her credit report on “Credit Karma.”
12. On the report, Ms. Bundy observed trade lines from all the Debt Collector Defendant.
13. Debt Collector (AD Astra Recovery Services Inc.,) furnished a trade line of \$1,675, allegedly owned to Speedycash.
14. Debt Collector (Jefferson Capital Systems LLC) furnished a trade line of \$907, allegedly owned to Verizon Wireless.
15. Debt Collector (Kansas Counselors Inc.,) furnished a trade line of \$231, allegedly owned to Palmeri Family Medicine.
16. Also on May 17, 2021, Ms. Bundy made disputes via telephone about the accounts in question. However, on March 30, 2022, Ms. Bundy re-checked her credit reports and although the Debt Collectors had several communications with the consumer reporting agencies, the Debt Collectors failed to communicate the alleged debts in question were disputed by the Ms. Bundy.
17. The Debt Collector’s publishing of such inaccurate and incomplete information has severely damaged the personal and credit reputation of

Ms. Bundy and caused severe humiliation, emotional distress, mental anguish and FICO scores.

18. Defendant materially lowered the consumer credit score by failing to note Ms. Bundy dispute.
19. A debt reported without dispute results in a much lower credit score than a report of both the debt and the dispute. *Saunders v. Branch Banking and Trust Co. of VA*, 526 F. 3d 142, 146-47 (4th Cir. 2008).

**V. FIRST CLAIM FOR RELIEF**

**(Defendant AD Astra Recovery Services, Inc., Jefferson Capital Systems LLC,  
Kansas Counselors Inc.,)**

**15 U.S.C. §1692e(8)**

20. Plaintiff re-alleges and reincorporates all previous paragraphs as if fully set out herein.
21. The Debt Collectors violated the FDCPA.
22. The Debt Collectors' violations include, but are not limited to, the following:

The Debt Collector violated 15 U.S.C § 1692e(8) of the FDCPA by failing to disclose to the consumer reporting agencies the alleged debt was in dispute.


23. As a result of the above violations of the FDCPA, the Defendants are liable to the Mr. Dotson actual damages, statutory damages and cost.

**VI. JURY DEMAND AND PRAYER FOR RELIEF**

WHEREFORE, Plaintiff Mr. Dotson respectfully demands a jury trial and requests that judgment be entered in favor of Plaintiff and against the Debt Collector for:

- A. Judgment for the violations occurred for violating the FDCPA;
- B. Actual damages pursuant to 15 U.S.C 1692k(1)(2);
- C. Statutory damages pursuant to 15 U.S.C 1692k(2);
- D. Cost and pursuant to 15 U.S.C 1692k(3);
- E. For a deletion and further relief as the Court may deem just and proper.

Respectfully submitted:

  
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